



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MAR 01 2012

Mr. David Keith
Project Coordinator
Anchor QEA, LLC
614 Magnolia Avenue
Ocean Springs, MS 39654

RE: Draft Addendum 2 to the Sediment Sampling and Analysis Plan for Additional
Sediment Sampling South of Interstate Highway 10
San Jacinto River Waste Pits Superfund Site, Harris County, Texas
Unilateral Administrative Order, CERCLA Docket No. 06-03-10

Dear Mr. Keith:

The Environmental Protection Agency (EPA) and other agencies have performed reviews of the above referenced document dated December 29, 2011. The enclosed comments shall be incorporated in the Final Addendum 2 to the Sediment Sampling and Analysis Plan and copies provided for review and approval within thirty (30) days of receipt of this letter.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to miller.garyg@epa.gov.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Gary Miller".

Gary Miller
Remediation Project Manager

Enclosure

cc: Luda Voskov (TCEQ)
Bob Allen (Harris County)
Nicole Hausler (Port of Houston)
Jessica White (NOAA)

**Draft Addendum 2 to the Sediment Sampling and Analysis Plan (SAP) for
Additional Sediment Sampling South of Interstate Highway 10 (I-10)
San Jacinto River Waste Pits Superfund Site**

Comments:

1. **(General):** To address potential historical and current runoff pathways, a fourth sediment core location shall be added along the western shoreline of the peninsula within an inlet roughly along the line between sediment sample location SJNE018 and soil sample location SJSB006.
2. **(Analysis of Existing Information and Selection of Analytes, p. 2):** The section discusses the previous sediment sampling results from four locations west of the south impoundment, and that the results were within the range of the upstream background samples. However, additional samples south and downstream from the south impoundments were not discussed. These samples contained 52.6, 49.3, and 50.9 ng/kg TEQ, which are all significantly higher than the samples discussed and significantly above the upstream background range. The results of these sediment samples south of the south impoundment shall be included in the discussion, and the conclusion that dioxins and furans have not been released from the south impoundment shall be deleted. Instead, the conclusion shall state that the results of the planned sampling shall be considered with the previous samples to determine whether there has been a release from the south impoundment.
3. **(Analysis of Existing Information and Selection of Analytes, p. 3):** This section indicates that sediment samples will only be analyzed for Aroclors because concentrations of polychlorinated biphenyls (PCBs) have been very low in sediments with and near the northern impoundment; however, conditions at one site do not necessarily mimic conditions at another site. Due to the potential for weathering to cause Aroclors not to be detected when PCBs may in fact be present, a congener-specific analysis of PCBs shall be included.
4. **(Analysis of Existing Information and Selection of Analytes, p. 3):** This section also states that sufficient sediment from each sample will be archived for possible future analysis of dioxin-like PCB congeners. The EPA September 2009 draft *Recommended Toxicity Equivalency Factors (TEFs) for Human Health Risk Assessments of Dioxin and Dioxin-Like Compounds* recommends the use of the consensus TEF values for 2,3,7,8-tetrachlorodibenzo-p-dioxin and dioxin-like compounds, including polychlorinated dibenzo-p-dioxins (PCDDs), polychlorinated dibenzofurans (PCDFs), and polychlorinated biphenyls (PCBs), published in 2005 by the World Health Organization (WHO). Analysis of dioxin-like PCB congeners shall be included, and the TEF calculations shall include dioxins, furans, and dioxin-like PCBs.